

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MONICA HAGUE,
Plaintiff,

V.

UNIVERSITY OF TEXAS HEALTH
SCIENCE CENTER AT SAN ANTONIO,
Defendant.

Spiral notebook

CAUSE No. 5:11-cv-01101-RCL

PLAINTIFF'S MOTION TO ENTER JUDGMENT

Plaintiff asks the Court to order the clerk to enter the judgment against Defendant based on the jury's findings.

A. INTRODUCTION

1. Plaintiff is Monica Hague; Defendant is The University of Texas Health Science Center at San Antonio.
2. Plaintiff sued Defendant for retaliation.
3. After a trial on the merits, the Court submitted this case to the jury. Attached as Exhibit A are the questions the jury considered and the jury's answers. The findings of the jury entitle Plaintiff to judgment against Defendant.
4. Plaintiff requests that the judgment be set out promptly in a separate document as required by Federal Rule of Civil Procedure 58(a). Fed. R. Civ. P. 58(d).

B. ARGUMENT

5. A court must promptly approve the form of the judgment, which the clerk must promptly enter, when (1) the jury returns a special verdict, (2) the jury returns a general verdict with answers to written questions, or (3) the court grants other relief not described in Rule 58(b). Fed. R. Civ. P. 58(b)(2); *see Casey v. Long Island R.R.*, 406 F.3d 142, 144 (2d Cir. 2005).
6. On January 21, 2016, the jury returned a special verdict in favor of Plaintiff and against Defendant.
7. To date, the Court has not approved the form of the judgment.
8. Thus, the Court should approve the form of the judgment and order the clerk to enter the judgment for Plaintiff for the sum of \$15,000.00 in past pain and suffering damages,

\$100,000.00 in past wages and benefits, and \$83,705.00 in attorney fees and court costs from Defendant The University of Texas Health Science Center at San Antonio

C. CONCLUSION

9. For these reasons, Plaintiff asks the Court to approve the form of the judgment and order the clerk to enter the judgment.

Respectfully submitted,

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GAUL AND DUMONT
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By: **/s/ Malinda A. Gaul**

MALINDA A. GAUL
State Bar #08239800
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2016, I electronically filed the above and foregoing Plaintiff's Motion to Enter Judgment with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

Frank King
Laura Barbour
Assistant Attorney General
Texas Attorney General's Office
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

/s/ Malinda A. Gaul

MALINDA A. GAUL